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Attorney for Plaintiff

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF OREGON**  
**PORTLAND DIVISION**

JEFFREY R. PETERSON,

Plaintiff,

v.

ACUMED LLC, a Delaware Corporation,

Defendant.

No. CV 10-586-HU

PLAINTIFF'S OBJECTIONS TO  
EXHIBITS AND WITNESSES

**OBJECTIONS TO EXHIBITS**

**General Objection:**

Most of defendant's exhibits have been marked as confidential. Plaintiff object to the use of the exhibits marked as confidential on grounds that it could be confusing to the jury because it may create the impression that the original documents were marked as confidential. Inasmuch as the confidentiality of documents is an issue in the case plaintiff thinks that the marking should be redacted from the exhibits shown to the jury.

**Specific Objections:**

**Exhibit Nos.**

- 501 - 512 No Objection
- 513 Peterson Deposition Testimony. Plaintiff objects to the use of excerpts from a deposition transcript as an exhibit. If defendant wants to offer portions of the deposition as substantive evidence, the proper procedure would be to read it to the jury.
- 514 Email from Jeff Peterson to Melissa Angeli, dated February 3, 2010, Subject: Opportunity (GAL0001-2) and attached resume of Jeffrey Peterson (GAL 0030-31).  
Plaintiff objects on grounds of relevance and undue prejudice. FRE 402, 403 and 404. These exhibits relate to defendant's "resume fraud" defense and plaintiff's post-Acumed employment with Galois, Inc. See, Plaintiff's First and Second Motions in Limine
- 515 - 522 No Objection
- 523 - 529 Plaintiff objects on grounds of relevance and undue prejudice. FRE 402, 403 and 404. These exhibits relate to defendant's "resume fraud" defense and plaintiff's post-Acumed employment with Galois, Inc. See, Plaintiff's First and Second Motions in Limine
- 530 - 531 No objections
- 532 - 533 Plaintiff objects on grounds of relevance
- 534 - 541 No objections

**OBJECTIONS TO WITNESSES**

Plaintiff objects to testimony by the witness Melissa Angeli. This witness is identified as having evidence regarding Mr. Peterson's post-Acumed employment by Galois, Inc. This

evidence is the subject of plaintiff's second motion in limine and plaintiff objects for all the reasons state there. Additionally plaintiff notes that Angeli's testimony is estimated to last 30 minutes yet the summary of her testimony is only five lines long. The summary lacks sufficient detail regarding the witness's expected testimony and plaintiff objects for that reason as well.

Dated: 11 July, 2011

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/s/ Paul L. Breed  
Paul L. Breed, OSB No. 83161  
Of Attorneys for Plaintiff